

Case Number: 1:19- CV - 00650(NGG) (PK)

PROPOSED DISCOVERY PLAN			
	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	X		9/6/2019
2. Rule 26(a)(1) disclosures exchanged	X		
3. Requests made:			
a. Medical records authorization		X	
b. Section 160.50 releases for arrest records		X	
c. Identification of John Doe/Jane Doe defendants		X	
d. Proposed Stipulation of Confidentiality	X		
4. Procedures for producing Electronically Stored Information (ESI) discussed	X		
B. SETTLEMENT			
1. Plaintiff to make settlement demand	X		July 1, 2019
2. Defendant to make settlement offer	X		
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)		X	
4. Settlement Conference (proposed date)		X	
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings			3/25/2020
2. Initial documents requests and interrogatories			1/29/2020
3. All fact discovery to be completed (including disclosure of medical records)			6/10/2020
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			6/14/2020
5. Expert discovery (only if needed) <i>Check here if not applicable</i> <input type="checkbox"/>			

Plaintiff expert proposed field of expertise:			
Defendant expert proposed field of expertise:	Damages, Consumer Perception, Graham Cracker Market		
	DONE	NOT APPLICABLE	DATE
a. Case-in-chief expert report due			8/12/2020
b. Rebuttal expert report due			9/10/14/2020
c. Depositions of experts to be completed			11/12/2/2020
6. Completion of ALL DISCOVERY			11/12/2/2020
7. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated			11/12/16/2020
8. If District Judge requires Pre-Motion Conference, date to make request			12/16/2020
9. If District Judge does not require Pre-Motion Conference, date to submit briefing schedule		X	
10. Joint Pre-Trial Order due (if no dispositive motion filed)			90 days after later of certification motion or dispositive motion decision.
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
2. All parties consent to Magistrate Judge jurisdiction for trial?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases		X	
a. Response due		X	
b. Reply due		X	
2. Motion for Rule 23 class certification			30 days after decision on dispositive motion, if any.
a. Response due			60 days after opening brief on motion for class certification.
b. Reply due			30 days after response on

			motion for class certification.
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This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

Peggy Kuo

PEGGY KUO

United States Magistrate Judge

12/6/19
Date